## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:18-cr-167

vs.

Hon. Paul L. Maloney

YVETTE BROWN,

Defendant.

## **DEFENDANT'S MOTION FOR VARIANCE**

NOW COMES the defendant, Yvette Brown, by and through her attorneys, Willey and Chamberlain LLP, and hereby moves pursuant to 18 U.S.C. § 3553(a) and other authority for a downward variance from the advisory guidelines range.

This motion is supported by the accompanying sentencing memorandum.

Dated: November 30, 2019

Respectfully Submitted,

WILLEY & CHAMBERLAIN LLP Attorney for Defendant

s/ Julia A. Kelly

Julia A. Kelly (P77407)
300 Ottawa Avenue NW, Suite 810
Grand Rapids, Michigan 49503
(616) 458-2212
jak@willeychamberlain.com